



April 30, 2020

Continuous Learning Frequently Asked Questions

Introduction

To reflect additional questions received from the field specifically related to Continuous Learning, the Iowa Department of Education is providing this frequently asked questions (FAQs) guidance. This FAQ document should be used in conjunction with other Continuous Learning guidance including: [Continuous Learning and Return to Learn Guidance](#) (released April 17th), [Procedures for Continuous Learning](#) (released April 2nd), and [Provision of Continuous Learning](#) (released March 27th).

FAQs are grouped by the following areas:

- [Attendance](#),
- [General](#),
- [Grades/Credit](#),
- [Graduation](#),
- [Internet Access](#), and
- [Special Education](#).

Attendance

New (4-30-20): How do we report "Days Enrolled" through SRI during the recommended school closures from March 16th through April 10th?

In your student information system, these days should be set to non-school days (such as how you would set days missed for inclement weather). Schools were considered closed during this time.

Updated (4-30-20): How do we report "Days Enrolled" through SRI if we are providing **required educational services** from April 13th through the remainder of the school year?

Taking and recording attendance is not required but is optional. If your school is not taking attendance, these days should be set to non-school days (such as how you would set days missed for inclement weather) in your student information system. If you choose to take attendance, keep these days marked as school days in your student information system.

New (4-30-20): How do we report "Days Enrolled" through SRI if we are providing **voluntary enrichment** from April 13th through the remainder of the school year?

In your student information system, these days should be set to non-school days (such as how you would set days missed for inclement weather). Schools are considered closed during this time.

General

New (4-30-20): What is the position of the Office of Civil Rights regarding online learning?

In its March 16, 2020 fact sheet, the Office of Civil Rights acknowledged that school districts have "significant latitude and authority to take necessary precautions to protect the health, safety, and welfare of students and school staff." The fact sheet goes on to discuss the necessity to not discriminate in the provision of services and can be found here: <https://www2.ed.gov/about/offices/list/ocr/docs/ocr-coronavirus-fact-sheet.pdf>.

New (4-30-20): Do you recommend that districts provide continuous learning communications and materials to parents, students, or both?

This is a local decision, but the student's grade level should be taken into consideration when deciding.

New (4-30-20): If we are providing **required educational services**, do we need to instruct online for the same number of hours each day as we did in-person?

No, it is not required that educational services are provided for the same number of hours as if in-person instruction occurred. Under both the voluntary enrichment and required educational services options, instructional days/hours requirements are waived.

New (4-30-20): Can we initially choose to implement one method of continuous learning and then switch to the other?

Yes, districts may choose to initially implement voluntary educational enrichment or required educational services and then decide to switch to the other method. If districts switch after April 10th, they must indicate this on the Continuous Learning collection in CASA.

New (4-30-20): If we are providing **voluntary enrichment**, can new content be introduced, assuming it is not graded?

When providing voluntary enrichment, the goal is not to progress through the standards. This should be a focus on review and practice but does not prohibit the introduction of new concepts and materials. Districts should keep in mind that if new information is introduced while providing voluntary enrichment, supports for students with disabilities to access, participate, and progress in the new content will need to be provided. Districts should also keep in mind that the new content will need to be provided equitably to all students once schools are back in session.

New (4-30-20): Can we continue to support driver's education course work and/or "behind the wheel" driving time while schools are closed?

The Department of Transportation has legal authority over driver's education. They have taken steps to help driver's education programs such as allowing virtual classroom instruction for driver's education. In addition, Iowa Administrative rule 761-634.4 has been temporarily waived by the Iowa DOT Director, which establishes certain requirements for the behind-the-wheel driving components of driver education. More information can be found at <https://iowadot.gov/mvd/driverseducation>.

New (4-30-20): Will districts need to meet the requirements of Iowa Code 281—49.3 related to the Individual Career and Academic Planning (ICAP) this spring?

Many school districts may have had plans to complete the ICAP requirements for the 2019-2020 school year this spring. However, due to cancellation of events and school closures, students may not be able to complete components within the ICAP. Some activities could be completed within the district's career information system, and it is a local district decision to assign those lessons. School districts will submit the

data that is available in September when the CSIP is completed in CASA. There is no penalty for not having all students complete ICAP components for the 2019-2020 school year.

New (4-30-20): If we are providing **voluntary enrichment**, and school is considered closed, can we still enroll new students who move into the district?

Yes, new students should be enrolled as they would be when school is open.

New (4-30-20): If we are providing **required educational services**, can we choose to only provide those services for core courses (for example, not provide them for elective courses)?

Yes, districts may choose to provide required educational services for only some courses, such as core courses. Equity across the student body must be considered when making this decision. For example, a district may not choose to provide required educational services only for courses that serve specific groups of students, such as AP courses.

New (4-30-20): Can students be promoted to the next grade if we are providing **voluntary enrichment**?

Promotion and retention of students is a local decision.

New (4-30-20): Can we download and use (either electronically or through making paper copies) materials from education vendors that we find online?

This may be an option, but schools should continue to follow all copyright guidelines that are in place.

Grades/Credit

New (4-30-20): Can we grade student work (assignments, tests, etc.) that is assigned/completed during closure if we are providing **required educational services**?

Yes, schools may grade new student work that occurs during closure if they are providing required educational services.

New (4-30-20): Can we grade student work (assignments, tests, etc.) that is assigned/recommended during closures if we are providing **voluntary enrichment**?

Schools cannot grade student work that is newly assigned, or recommended to be completed, during school closures (including new and extra credit opportunities). However, schools can update student grades for work that was assigned before school closures in three situations noted below. If schools choose to update grades in any of these situations, they must provide opportunities to all students, including those choosing not to participate in voluntary enrichment this spring. This means some students may have their grades updated for this school year once school closures are over (meaning next school year). Depending on the functionality of the grade book in the local student information system, schools may need to keep a record of grades on individual assignments/exams that are updated next school year in another place so that they have record of how these assignments/exams affect final grades that are assigned.

Schools must also be sure to provide the opportunities to all students including students who may not have internet/technology access, students on IEPs, and English learners.

Situations where grades may be updated when a school is providing voluntary enrichment:

- 1) Schools can allow students to turn in missing work that was assigned before school closure, and they may grade that work during school closure.
- 2) Schools can allow students to improve their grades on work that was assigned and turned in before school closure, and they may grade the updated work during school closure.
- 3) Schools can allow students to retake exams that occurred before school closure, and they may grade the updated exams during school closure.

New (4-30-20): If we are providing **voluntary enrichment**, what are the parameters for assigning final grades and awarding credit for the portion of the school year during school closures?

The school may assign final grades/award credit at the end of their instructional calendar for this school year, similar to when they would have assigned grades/credit during normal circumstances. The practices for assigning final grades and awarding credit is a local decision and some options to consider are below. Please be sure that the school, student, and family understand the implications on credit accrual, high school GPA, and postsecondary entrance for each option you make available:

- a) Award final grades/credit based on the student's grade at the time of school closure in March.
- b) Allow students to update their grades as described in this guidance document, and then award final grades/credit.
- c) Give students an incomplete as their final grade and provide opportunities for students to do work to update that grade and receive credit once school closures are over. This may mean updating a final grade/credit for this school year during next school year.
- d) Give students an incomplete as their final grade and provide opportunities for students to show competency in the subject matter once school closures are over. This may mean updating a final grade/credit for this school year during next school year.
- e) Allow students to update their grades as described in this guidance document, and then award final grades/credit.
- f) Give students an incomplete as their final grade for a course and provide opportunities for students to do work to update that grade and receive credit once school closures are over. This may mean updating a final grade/credit for this school year during a future school year.
- g) Give students an incomplete as their final grade for a course and provide opportunities for students to show competency in the subject matter once school closures are over. This may mean updating a final grade/credit for this school year during a future school year.
- h) Change grading procedures for the portion of the school year during school closures so that a grade is assigned on a pass/fail basis rather than on a letter-based scale.
- i) Allow students to choose to audit a course or take it as a "no credit" course.
- j) Allow students to withdraw from a course.

New (4-30-20): If we have been using traditional grading, can we switch to a competency-based grading model for the portion of the school year during school closures?

Yes, grading practices are a local decision.

New (4-30-20): If we have been using a letter-based grading scale, can we switch to pass/fail grades for the portion of the school year during school closures?

Yes, grading practices are a local decision.

New (4-30-20): If we have middle school students taking high school courses and we have chosen **voluntary enrichment** for our middle school grade levels and **required educational services** for our high school grade levels, can we require work and update grades to those middle schoolers?

Yes, in this circumstance you may require work and provide grades for the middle schoolers in high school courses.

New (4-30-20): Can students continue to participate in and receive credit in credit recovery programs (Edmentum, Edgenuity, etc.)?

Yes, students can continue to participate in and receive credit in credit recovery programs under both voluntary enrichment and required educational services.

New (4-30-20): Can we newly enroll students in credit recovery programs during school closures?

Yes, but only if the opportunity is equitably available to all students who may benefit from credit recovery. This includes making the opportunity for credit recovery available later if the student is not able to participate now.

New (4-30-20): Will pass/fail classes be accepted by the Iowa Regents institutions for entrance requirements?

Yes, if students earn high school credit for a class, even if the class uses pass/fail grading, it will count towards entrance requirements at Iowa Regents institutions so long as a student receives a passing grade.

New (4-30-20): Will there be changes for students graduating in spring 2020 related to the NCAA initial-eligibility standard in fall 2020?

Please refer to NCAA eligibility guidance posted at http://fs.ncaa.org/Docs/eligibility_center/COVID-19_Public.pdf.

Graduation

New (4-30-20): Are there changes to graduation requirements because of school closures?

Governor Reynolds temporarily suspended graduation requirements in Iowa Code sections 256.7(26)(a) and 256.11(5) and Iowa Administrative Code rule 281-12.5(5) related to curriculum standards and completion of specific units of credit for completion of a high school program of study for the graduating class of 2020. Graduation requirements were also temporarily suspended for § 256.11(6)(c) and Iowa Administrative Code rule 281-12.5(20) related to completion of a psychomotor course that leads to certification in cardiopulmonary resuscitation (CPR) in order to graduate from high school.

At this time, there have not been any suspensions of graduation requirements beyond the graduating class of 2020.

New (4-30-20): Can we hold a ceremony to honor our graduates?

A graduation ceremony is just that - a ceremony. It has no legal significance, it is not required by Iowa Code, and the Iowa Department of Education does not heavily regulate such ceremonies other than to ensure that students are not charged inappropriate fees. Holding a ceremony is largely a matter of local governance and compliance with the governor's proclamations. While the Department's approval is not needed, districts and schools should confer with local public health and public safety officials before gathering. We also encourage

districts to consider scheduling ceremonies in June, since proclamations and public health conditions may change by that time.

Internet Access

New (4-30-20): If our school is providing **required educational services**, must we provide laptops or tablets and hot spots or other internet access to all students who don't have this technology available?

No, the district is not required to provide this technology to all students. Although instruction under required education services is typically provided online, other models of learning and other methodologies like paper packets can also be made available. The district must ensure that academic work is equivalent in rigor to typical classroom work and ensure that all students can participate.

New (4-30-20): Can we use special education funds to pay for internet access for students and/or teachers at home if their family is not able to pay the cost of internet?

Special education funds cannot be used to pay for services, such as internet, that are necessary for any student to access online educational opportunities or services. They may, however, be used to purchase equipment that an eligible individual needs, as a result of their disability, to access online activities provided by the district.

Special Education

New (4-30-20): Which IEP services are AEAs required to provide to districts during school closures?

If the district is closed to all students and no voluntary enrichment or required educational services are being provided to students, the AEA is not required to provide IEP services to individuals as specified in each individual's IEP.

If a district is providing voluntary enrichment, the AEA may offer consultation services to district administrators, teachers, and other educational staff to ensure access to educational enrichment activities. The AEA is not required to provide IEP services to individuals as specified in each individual's IEP. An AEA may provide general consultation to community members at the discretion of the AEA.

If a district is providing required educational services, the AEA is required to provide IEP services to individuals as specified in each student's IEP.

New (4-30-20): Do we need to hold an IEP meeting for each student with an IEP to decide if the student can participate in online learning? Would this include a change of placement to homebound for services?

The IEP team does not need to reconvene for every student before education services are provided. We recommend that you prioritize meetings for the students who you know will not be able to access the content as it's provided. Districts providing voluntary educational opportunities must still hold IEP meetings as needed. Teachers must be available to participate unless the safety and well-being of participants are at risk. This is not considered a change in placement as all students are learning in their home environment.

New (4-30-20): If schools create content and materials either online or through paper packets, is there the expectation that they be modified for students with an IEP?

Yes, under both voluntary enrichment and required educational services, the district must take into consideration the needs of all students, including those with IEPs. The learning activities that are provided to

students with IEPs do not need to be identical, but the district needs to provide access to similar content. This access may be in a different format to meet student needs.

New (4-30-20): Does the public district need to provide special education services to nonpublic students who are dual enrolled in the public district?

The continuous learning method chosen by the public district determines what services are provided to nonpublic students.

New (4-30-20): If students with an IEP cannot participate in online opportunities, can our approach be to continue to provide the opportunities to students that can participate and to offer compensatory options to students with IEPs once schools are back in operation?

This is not an option. The district needs to work to provide supports to students with IEPs during school closures. If the district is providing voluntary educational opportunities, the district must provide means for the student to access and participate. If the district is providing required educational services, the district must provide means for the student to access, participate, and progress in the curriculum.

New (4-30-20): If an IEP student has a 1:1 required paraprofessional, how we do continue that service if we are providing *required educational services*?

Some services may not be feasible to provide if they must be provided in-person. The IEP team, including the parent, should consider what is needed as a result of the student's disability and be creative in ways to address those needs. This includes any counseling or training the family may need.

New (4-30-20): If ensuring sufficient progress is part of FAPE, what guidance would we provide IEP teams at schools to determine how to conduct progress monitoring with integrity using various assessments we currently utilize aligned to standards etc.?

IEP teams, including the parent, will need to identify the ways that are feasible and meaningfully reflect what was provided and how the student responded. The feasibility of methods will vary depending on each situation.

New (4-30-20): Can we reconvene IEP meetings telephonically?

Yes, you may use telephone and/or other technology to reconvene IEP meetings so long as the entire team is able to participate.

New (4-30-20): If we are providing a combination of *voluntary enrichment and required educational services*, what is the requirement for provision of special education services for the voluntary grade levels as compared to the required?

Districts providing voluntary enrichment services must consider how the student with an IEP will have access to the enrichment opportunities. Accommodations and modifications may be necessary. Districts requiring educational services must provide services and supports as outline in the IEP. During this pandemic, it is better to err on providing too much, rather than too little.

New (4-30-20): If we are providing **voluntary enrichment** and no direct special education services are provided by the district, can students that are placed in alternative learning environments (i.e., a therapeutic school) still be provided services by that school?

Yes. The student may voluntarily continue to participate in the alternative learning environment, and the district may continue to pay for those services.

New (4-30-20): Can we provide specially designed instruction if we're providing **voluntary enrichment**?

Districts providing voluntary educational opportunities during school closure do not have to provide IEP services. Districts may provide more - even specially designed instruction - and do not need to restrict their interactions with students and families. It is important that opportunities and services be provided equitably.

New (4-30-20): What are the district's responsibilities for provision of IDEA if we are providing **voluntary enrichment**?

Voluntary refers to the student/family choice to participate in enrichment activities. IDEA rights and responsibilities still apply, regardless of the district's voluntary or required status.

New (4-30-20): What considerations should we give for extended school year services (ESYS) after June 30, 2020?

Districts must provide any ESYS through their voluntary or required continuous learning plan, while also complying with the governor's most recent emergency proclamations and the advice of the Iowa Department of Public Health and/or local public health department. ESYS must also be included in each districts' Return-to-Learn Plan, due July 1, 2020. All IDEA rights and responsibilities apply to ESYS.

New (4-30-20): Can IEP goals be suspended when a district is providing required learning?

No. The IEP goals may look different, but districts requiring educational services must consider whether the individual is receiving FAPE (which includes the provision of specially designed instruction).

Questions and Additional Guidance

If you have questions, please contact your [school improvement consultant](#). If they are unable to assist you, they will connect you with the appropriate person. For additional COVID-19 guidance and information, please visit the Department's [COVID-19 webpage](#).